

PATRICK L. FORTE, #80050
ANNE Y. SHIAU, #273709
LAW OFFICES OF PATRICK L. FORTE
One Kaiser Plaza, #480
Oakland, CA 94612
Telephone: (510) 465-3328
Facsimile: (510) 763-8354

Attorneys for Debtor

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA

In re: **Case No. 10-40600 WJL**
YVETTE LYNN HARWARD, **Chapter 13**
Debtor. **MOTION TO MODIFY CHAPTER 13 PLAN**

The above-named debtor applies to the court for an order to modify her Chapter 13 Plan as follows:

Debtor shall surrender the 2006 Audi A4 to Audi Financial. Commencing January 2013, debtor will pay \$100.00 per month to the Trustee. Any plan arrearages shall be forgiven. Unsecured, non-priority creditors shall be paid on a pro-tanto basis.

The modification is sought on the following grounds:
Debtor can no longer afford to keep the aforementioned vehicle as her expenses have increased.

Dated: January 3, 2013

/s/ Patrick L. Forte
PATRICK L. FORTE
Attorney for Debtor